I am writing in SUPPORT of Kenwood's proposed rule change. The basic reason for my support is the premise that the rules should be interpreted as broadly as possible on a federal level. Locally, there may or may not be use for this system and it may not fit with local usage of the 2m band.

There are already rules and systems in place covering this issue.

Many of the FCC's current rules concerning amateur radio are not appropriate at the current time. My favorite example is the ceiling on baud rates at specific frequencies. I assume the intention was to limit bandwidth although this is not stated (I have not seen it anywhere). If this limitation were on bandwidth, rather than baud rate, I believe there would be a whole new focus on modulation schemes that maximize throughput given that bandwidth. Instead, this rule has stifled innovation and is contrary to the amateur's natural desire to lead technology.

If there is a specific concern, then we should address it specifically, not simply disallow the use of a valuable system. As much as I like this system, I do find it unfortunate that it doesn't currently support other bands. At the same time, I believe that for most applications it will be perfectly adequate and potentially preferrable as currently implemented.

I live in one of the Southern suburbs of Seattle and find 2m FM usage very low. I tend to monitor 146.580 when I'm driving around and only find one or two people a day using this frequency. When I want to find a simplex channel, I have never had to go more than one channel up or down.

I don't see how this system could possibly be more troublesome than cross-band repeat which is available in many dual-band mobile rigs. The number of installed Kenwood units would be low and the number of people using this feature would be even lower. It seems to me Kenwood has done an excellent job engineering this system to be as low impact as possible.

I am an ARRL member and although I disagree with the ARRL's position regarding this system, it seems they have the means to regulate its use.

There are already coordinating bodies to handle repeaters, both permanent

and temporary. Perhaps power levels or license class limitations would provide better control. Personally, I believe all these are unnecessary but would be more acceptable that a blanket denial of service.

Please reconsider this decision. In my opinion, the test of a good rule should be whether it limits operation that is always bad or is not currently covered by an existing rule. This rule fails on both counts. Simply because this rule existed in some form before Kenwood marketed this particular hardware should not be a valid reason to deny the application.

Thank you for your consideration,

Kenneth Richards
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Amateur Extra